

From: [MCCLINCY Matt](#)
To: [Eric Blischke/R10/USEPA/US@EPA](#)
Subject: RE: Arkema Preliminary EE/CA Data
Date: 01/25/2010 01:49 PM

Eric,

I think we are seeing/saying the same thing. It would be interesting to see these plots along with the new data added.

The unvalidated EE/CA data achieved single digit ug/kg detection limits for most of the samples and aroclors. Assuming that this data set stands validation review and we believe the sample were obtained from representative locations (the 15 composites were collected for waste characterization purposes), the EE/CA data set indicates that there is not a PCB issue off of Arkema or that it is limited to a couple of hot spots. This is the opposite of what the congener data indicates. Maybe aroclor analysis is not the right tool for this AOPC.

-----Original Message-----

From: Blischke.Eric@epamail.epa.gov
[mailto:Blischke.Eric@epamail.epa.gov]
Sent: Monday, January 25, 2010 12:47 PM
To: MCCLINCY Matt
Subject: Re: Arkema Preliminary EE/CA Data

Matt, attached are a couple of screen shots from QM. The first shows Aroclor 1248 results in the vicinity of Arkema, the second shows PCB 126 results near Arkema. It should be noted that PCB 126 was detected at various in all nearshore samples analyzed in the vicinity of Arkema. However, Aroclor 1248 has a number of non-detects (some elevated due to interference) at Arkema. I think that the presence of PCB 126 indicates that PCBs are present at Arkema. Further the Aroclor 1248 non-detects show that there are some interference issues with Aroclor analyses.

I think what is needed is to map total aroclors and total congeners and compare the two. However, this cannot be done in QM and would require some data manipulation to extract the data from the access data base.

Eric

(See attached file: ArkemaAroclor1248.bmp)(See attached file: ArkemaPCB126.bmp)

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| From: |
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> |"MCCLINCY Matt" <MCCLINCY.Matt@deq.state.or.us>
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> |Sean Sheldrake/R10/USEPA/US@EPA, Kristine Koch/R10/USEPA/US@EPA, Eric
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> |"PETERSON Jenn L" <PETERSON.Jenn@deq.state.or.us>, "POULSEN Mike"
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All,

The unvalidated Arkema EE/CA sediment data included 15 sediment samples for PCB aroclors which were all ND. This finding appears to be inconsistent with the RI total PCB figures. There are a number of potential reasons for this. For example:

* Unvalidated Arkema data are not correct (i.e., false negatives).

* Previous aroclor detections may be false positives due to interferences

* Previous aroclor detections are spatially separate from the EE/CA sample locations

* High total PCBs are based on PCB congener data which is not consistent with the aroclor data. DEQ has discussed this model with EPA in the past and the potential for the chloralkali waste waters to have a non aroclor PCB component.

The conceptual model for the presence and distribution of PCBs in sediment adjacent to Arkema is undefined. Since sediment adjacent to Arkema has elevated DDX, dioxins/furans and PCBs it is important to define (if possible) the model for the PCB distribution in sediment. As the EPA team reviews the EE/CA data, refinement of the PCB sediment model should be part of this evaluation.

Matt McClincy

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